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(1)	I N D E X		
(2)	Examination by	Witness Name	Page
(3)	EXAMINATION BY-----	WILLIAM NIETO -----	7
	MR. MOSER		
(4)	EXHIBITS MARKED FOR IDENTIFICATION		
(5)	No.	Description	Page
(6)	1	Affidavit-----	45
(7)	2	Form 1120-S, 2018 -----	64
(8)	3	E-mail-----	72
(9)	4	Form 1120-S, 2020-----	72
(10)	5	Blank Form 1120-S-----	72
(11)	INFORMATION/DOCUMENTATION REQUESTED		
(12)		Page	Line
(13)	Account number.-----	32	19
(14)	QUESTIONS/ANSWERS MARKED IN THE TRANSCRIPT		
		Page	Line
(15)	For what reason other than Jonatan saying he ---	25	18
(16)	didn't have a way to cash the check did you		
	pay Jonatan in cash?		
(17)	Can you be more specific about what you would --	29	25
(18)	do?		
(19)	Do you understand my question?-----	30	20
(20)	Would the amounts that you withdraw from Chase -	32	21
	show the wages that you paid to Jonatan and		
(21)	Hector?		
(22)	Would you take precisely the amount out you ----	33	13
	needed to pay Jonatan and Hector or some		
(23)	different amount out?		
(24)	Why did you allow him to drive a truck after ---	40	10
(25)	he told you he didn't have a CDL?		

	INFORMATION/DOCUMENTATION REQUESTED	Page	Line
(1)			
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(4)	Is a CDL required to drive your vehicles?-----	40	13
(5)	Do you have any records showing that Jorge was - employed by you?	41	12
(6)			
(7)	Jorge knows the hours that Jonatan worked; ----- correct?	41	16
(8)	Do you have any documents that would show that - Jorge was actually a co-worker of Jonatan in	42	3
(9)	the summer of 2017?		
(10)	Was there a regular time Jonatan had to report - to Six Jackson?	43	5
(11)			
(12)	In beginning of his employment, did Jonatan ---- Barahona have a regular time that he was supposed to report?	43	16
(13)			
(14)	In light of what is in number seven of the ----- declaration, would you like to make any corrections to this declaration?	58	5
(15)			
(16)	How much would he be paid? Would he be paid --- any extra if he worked until 4:30?	59	10
(17)	Do you know why no salaries or wages are ----- listed on this tax return?	69	18
(18)			
(19)	Directly to the right of cost of labor, do you - see a number?	71	3
(20)	How much did you pay in salary and wages to ---- employees in 2018?	71	8
(21)			
(22)	Is everything in this document true and ----- accurate?	75	3
(23)	Did you ever communicate to your accountant ---- any information regarding wages or salaries	75	21
(24)	paid to employees?		
(25)			

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	INFORMATION/DOCUMENTATION REQUESTED	Page	Line
(1)			
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(3)			
(4)			
(5)	Did your accountant ever ask for information --- regarding salaries and wages?	76	7
(6)			
(7)	So, what records did you have regarding wages -- and salaries in 2018?	77	12
(8)	What documents did you keep regarding wages ---- and salaries in 2019?	77	22
(9)			
(10)	What documents did you keep with regard to ----- wages and salaries paid by Paradise in 2020?	78	3
(11)	You had employees in 2019?-----	78	8
(12)	You had employees in 2020?-----	78	11
(13)	Do you recall anything you gave to your ----- accountant to prepare these returns?	78	14
(14)			
(15)	For the year 2020, what documents did you ----- provide to your accountant for the purposes of preparing the tax return?	79	3
(16)			
(17)	Did you see him put the pills in the truck? ----	83	2
(18)	What did you do when he laughed?-----	83	14
(19)	Did you tell him to stop smoking pot too?-----	83	22
(20)	Did you tell him to stop smoking marijuana?-----	84	2
(21)	As a result of you telling Mr. Barahona to ----- stop smoking marijuana and stop taking the pills, did you see any change in his behavior?	84	6
(22)	Why didn't you fire him?-----	84	10
(23)	Do you believe it is good practice to allow ---- employees to use dangerous tools while smoking marijuana?	84	12
(24)			
(25)	Did you ever fire Jonatan?-----	84	22

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	INFORMATION/DOCUMENTATION REQUESTED	Page	Line
(1)			
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(5)			
(6)	Did you ever fire Hector?-----	84	24
(7)	Did you have any full-time employees at ----- Paradise in 2018?	85	4
(8)			
(9)	Did you have any full-time employees in ----- Paradise in 2019?	85	9
(10)	When Jonatan wouldn't call you to see if work -- was available, who did the work that week?	85	13
(11)			
(12)	Did you take any steps when you opened your ---- business to find out about wage and hour laws?	86	9
(13)	During any time did you take any steps to find - out the wage and hour laws that apply to	86	16
(14)	employees of Paradise?		
(15)	Any time before this case was commenced, did --- you take any steps to become familiar with	86	22
(16)	wage and hour laws?		
(17)	Do you know what overtime is?-----	87	2
(18)	What is the regular work week?-----	87	4
(19)	Did you ever inquire as to whether the way ----- which you were paying Hector Hernandez or	87	9
(20)	Jonatan Barahona complied with the law?		
(21)	What is your cell phone number?-----	87	16
(22)			
(23)			
(24)			
(25)			